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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 INTERNATIONAL MARKETS LIVE,
 11 INC., a New York corporation dba
 iMARKETSLIVE,

12 Plaintiff,

13 vs.

14 MATTHEW THAYER,

15 Defendant.

Case No.: 2:22-cv-00077-RFB-DJA

**STIPULATION AND ORDER FOR
EXTENSION OF TIME**

FIRST REQUEST

16 Defendant Matthew Thayer (“Defendant”), by and through his attorneys, and Plaintiff
 17 International Markets Live, Inc. dba iMarketslive (“Plaintiff”), by and through its attorney, hereby
 18 submit this stipulation and order to continue the time needed to submit a stipulation to this Court on
 19 whether the Parties will need jurisdictional discovery or an evidentiary hearing pursuant to this
 20 Court’s Minute Order. *See* [ECF No. 33].

21 This Court requested that the parties provide this Court with a stipulation on or before June
 22 13, 2022 regarding whether they will need jurisdictional discovery. The Parties have met and
 23 conferred several times to discuss whether they anticipate needing jurisdictional discovery and have
 24 exchanged limited information on the subject. After these several meet and confer sessions, it
 25 appears that Plaintiff needs an additional week to gather information regarding its jurisdictional
 26 arguments before the parties can appropriately inform this Court as to whether jurisdictional
 27 discovery will be needed.

1 The parties therefore request and stipulate that this Court give the parties until June 20, 2022
 2 to provide this Court with the requested stipulation. The parties also to the request and stipulate that
 3 Defendant's deadline to file a response to the Amended Complaint be moved to June 28, 2022,
 4 Plaintiff's Opposition to any such responsive motion be moved to July 13, 2022, and Defendant's
 5 reply be moved to July 20, 2022.

6 The parties are working cooperatively to gather relevant information related to jurisdiction.
 7 The Parties jointly request that the Court enter the following Order approving that Stipulation. This
 8 Stipulation is entered into in good faith and not for the purposes of delay.

9
 10 DATED this 17th day of June, 2022.

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 12 McDONALD CARANO LLP

13 By: /s/ Tara U. Teegarden
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19
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DATED this 17th day of June, 2022.

21
 22 LAW OFFICES OF P. STERLING KERR

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28
 29 Attorneys for Plaintiff

30
 31 IT IS SO ORDERED.

32
 33 
 34 RICHARD E. BOULWARE, II
 35 United States District Court

36
 37 June 20, 2022

38
 39 DATED